

Mar 15, 2022

AT GREENBELT  
CLERK, U.S. DISTRICT COURT  
DISTRICT OF MARYLAND  
BY MD Deputy

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 22-mj-0820-TJS

ISRAEL EDENILSON RAMIREZ,

Defendant.

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**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Matthew Houlihan, of the Federal Bureau of Investigation ("FBI"), having been duly sworn, state as follows:

**INTRODUCTION**

1. This affidavit is made in support of a criminal complaint charging Israel Edenilson **RAMIREZ** with violations of 18 U.S.C. § 2113(a). Specifically, there is probable cause to believe that on or about November 19, 2021, and December 3, 2021, **RAMIREZ** robbed two financial institutions, Bank One and Bank Two, respectively (the "**TARGET OFFENSES**").

2. The facts set forth in this affidavit are based upon my investigation of this matter, my training and experience, and information obtained from various other law enforcement personnel and witnesses. This affidavit is intended to show merely that there is probable cause for the requested complaint; it does not purport to set forth all of my knowledge of or investigation into this matter. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the **TARGET OFFENSES** have been committed by **RAMIREZ**. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

### **AFFIANT BACKGROUND**

3. I am a Special Agent with the FBI, currently assigned to a Baltimore Violent Crime and Gang squad, where I am responsible for the investigation of violent crimes and gangs. As an FBI Special Agent, I have participated in multiple violent crime and gang investigations. In addition, I have received both formal and informal training from the FBI regarding violent crime and gang investigations. Prior to the position of Special Agent, I served as a Surveillance Specialist for the FBI for approximately two and a half years, specializing in Counterterrorism and Counterintelligence investigations.

4. As an FBI Special Agent, I have received special training and experience in interviewing and interrogation techniques, arrest procedures, search and seizure procedures, search warrant applications and procedures, evidence collection procedures, and crime scene management. In the course of my training and experience, I have become familiar with the methods and techniques associated with violent criminals, the distribution of controlled dangerous substances, and the organization of criminal conspiracies, and bank robberies. In the course of conducting these investigations, I have been involved in the use of investigative techniques including interviewing informants and cooperating witnesses, conducting physical and electronic surveillance, and consensual monitoring of communications.

### **STATEMENT OF PROBABLE CAUSE**

#### **I. November 19, 2021 Bank One Robbery**

5. On November 19, 2021, at approximately 11:33 a.m., officers from the Montgomery County Police Department (“MCPD”) responded to a reported robbery at Bank One located in Silver Spring, Maryland. Upon arrival, officers interviewed Victim 1 and Victim 2, who provided an account of the robbery that took place that morning.

6. Victim 1 and Victim 2 described the individual who committed the robbery, later identified as **RAMIREZ**, as a Hispanic Male, 5'10", 20-30' years old, with a beard, and a chubby and medium build. **RAMIREZ** was wearing a blue knit hat (beanie), a black vest, a tan hooded jacket, a white face mask with designs on it, gray New Balance sneakers, and was carrying a black handgun. **RAMIREZ** was captured on Bank One surveillance footage.

7. According to Victim 1 and Victim 2, they were in the bank manager's office when an unknown individual (later identified as **RAMIREZ**) entered the office, brandished a firearm, and demanded \$10,000.00. **RAMIREZ** then fired one round into the floor of the office. Victim 1 agreed to comply and walked out of his office behind the teller window, where Victim 1 obtained \$10,000.00 in U.S. currency, which he handed to **RAMIREZ**. After receiving the money, **RAMIREZ** then walked toward the bank exit. While leaving the bank, **RAMIREZ** again discharged the firearm, firing one gunshot into a wall.

8. Surveillance video from a location near Bank One showed an individual in a burgundy pick-up truck leaving the area of Bank One shortly after the robbery. As described below, this pickup truck was later identified as a Chevrolet Silverado, registered to **RAMIREZ**.

9. Law enforcement recovered two 9 mm shell casings from the areas where **RAMIREZ** fired the rounds. As discussed below, these shell casings were later matched to a firearm registered to **RAMIREZ** and recovered from his residence during execution of a search warrant.

## **II. December 3, 2021 Bank Two Robbery**

10. On December 3, 2021, at approximately 9:03 a.m., MCPD officers responded to a robbery that took place at Bank Two located in Silver Spring, Maryland.

11. Officers interviewed Victim 3, who was present for the robbery. Victim 3 described the individual, later identified as **RAMIREZ**, as a Hispanic male, 5'5-5'6", 29-30 years old, 185 pounds, with a light beard and dark brown eyes. At the time of the robbery, **RAMIREZ** was wearing a green knit hat, dark Nike hooded sweatshirt, and was carrying a black handgun. During the robbery, Victim 3 saw **RAMIREZ** pull down his black mask and Victim 3 recognized **RAMIREZ** as a Bank Two customer. Victim 3 also positively identified a photograph of **RAMIREZ** as the suspect.

12. According to witness accounts and surveillance video, **RAMIREZ** walked into Bank Two, took out a black handgun, and fired a gunshot into the ceiling. **RAMIREZ** then approached Victim 3's teller station, pointed the gun at him and stated, "give me \$10,000.00 motherfucker and nothing else." Victim 3 handed **RAMIREZ** currency from his drawer and slid it to **RAMIREZ** under the teller window slot. After demanding more money, **RAMIREZ** left Bank Two, exiting through the rear door. In total, **RAMIREZ** stole approximately \$6,970.00.

13. Law enforcement recovered a 9 mm shell casing in the area where the suspect fired the round.

### **III. Arrest and Search Warrant**

14. After identifying **RAMIREZ** on December 3, 2021, law enforcement identified his address as an address in Burtonsville, Maryland (hereinafter "**RAMIREZ's** Residence"), which is located only 1.9 miles from Bank Two. Later that day, law enforcement conducted surveillance at **RAMIREZ's** Residence and observed **RAMIREZ** exit his residence and enter a burgundy Chevrolet Silverado bearing a known Maryland registration (hereinafter "Vehicle 1"). According to MVA records, **RAMIREZ** is the registered owner of Vehicle 1. Vehicle 1 matches the vehicle seen departing the area of the Bank One robbery on November 19, 2021.

15. Also on December 3, 2021, law enforcement located **RAMIREZ** and placed him under arrest without incident. **RAMIREZ** has been in the custody of Montgomery County since his arrest on December 3, 2021.

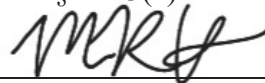
16. Law enforcement executed a search warrant at **RAMIREZ's** Residence. During the search, law enforcement recovered a 9 mm black handgun – a black Glock 17, serial number BGMM687 – which was registered to **RAMIREZ**. Law enforcement also recovered clothing worn in the Bank One robbery and clothing worn in the Bank Two robbery. Specifically, law enforcement recovered two pairs of New Balance sneakers that matched the description of the shoes worn by the individual who committed the robberies.

17. On December 7, 2021, law enforcement executed a search warrant on Vehicle 1 and located a green camouflage knit hat which was used during the Bank Two robbery.

18. Law enforcement conducted a forensic examination of the firearm which confirmed the 9 mm black handgun recovered from **RAMIREZ's** Residence was the same firearm that was discharged in the Bank One and Bank Two robberies.

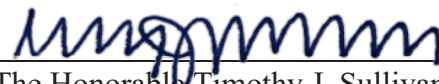
### CONCLUSION

19. Based upon the information set forth in this Affidavit, probable cause exists to believe that on or about November 19, 2021, and December 3, 2021, **ISRAEL EDENILSON RAMIREZ** committed Bank Robbery, in violation of 18 U.S.C. § 2113(a).



Matthew Houlihan, Special Agent  
Federal Bureau of Investigation

Affidavit submitted by email and attested to me as true and accurate by telephone consistent with Fed. R. Crim. P. 4.1 and 4 (d) this 14th day of March, 2022.



The Honorable Timothy J. Sullivan  
United States Magistrate Judge